

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

_____)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 02-4038
)	
PENNSYLVANIA INDUSTRIAL)	
DEVELOPMENT AUTHORITY and PIDC)	
FINANCING CORPORATION,)	
)	
Defendants.)	
_____)	

MOTION TO ENTER CONSENT DECREE

Plaintiff United States moves that the consent decree lodged in this action on June 24, 2002 be approved and entered. In support of this motion plaintiff states as follows:

1. The amended consent decree is fair, reasonable and consistent with the public interest as embodied in the Comprehensive Environmental Response, Compensation, and Liability Act, ("CERCLA"), 42 U.S.C. § 9601 et seq.

2. Notice soliciting public comments on the amended decree was published in the Federal Register and the 30 day period for submission of such comments has expired. No comments were received.

3. Counsel for both defendants has authorized the undersigned to represent that defendants consent to the granting of this motion and join in asking this court to approve and enter the consent decree. There are no other parties to this action.

Respectfully submitted,

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OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion to enter was served this __ day of August, 2002 via First Class United States mail upon representatives for defendants, Joseph Mee, 2600 Center Square West, Philadelphia, PA 19102-2126 and Louis Lipsky, Esquire, Lipsky and Brandt, Suite 2820, 1100 Market Street, Philadelphia, PA 19107.

SUSAN SHINKMAN
Assistant United States Attorney